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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

FIVE AIRCORP, INC., and FRANCISCO  
GARZA-VARGAS,

Plaintiffs,

v.

UNITED STATES OF AMERICA  
DEPARTMENT OF COMMERCE, and  
BUREAU OF INDUSTRY AND  
SECURITY,

Defendants.

2:20-CV-539-JCM-VCF

**United States' Unopposed Motion for an  
Extension of Time to File an Answer or  
Other Responsive Pleading to Plaintiffs'  
Petition for the Return of Seized  
Property (ECF No. 1) and Order**

**(First Request)**

The United States of America Department of Commerce and Bureau of Industry and Security ("Defendants" or "United States") moves this Court for an Order extending the time for Defendants to file its answer or other responsive pleading to Plaintiffs' Petition for the Return of Seized Property, ECF No. 1. Defendants requests an extension of time to and including August 12, 2020. This is Defendants' first request.

The grounds for an extension of time are as follows:

1. On July 14, 2020, undersigned counsel contacted Richard Schonfeld and David Chesnoff, counsel for Plaintiffs, who agreed to this extension of time.
2. In response to the COVID-19 outbreaks, this Court issued a series of orders which placed restrictions on court operations. *See* Temporary General Orders 2020-02, 2020-03, 2020-04, 2020-05, 2020-08. As court operations gradually

1 resume, the backlog of forfeiture work have increased significantly. The  
2 undersigned has a large and active case load with many tightly scheduled  
3 deadlines with the court for complex issues that have taken large amounts of  
4 time and resources to complete. Undersigned has worked extremely hard and  
5 efficiently to meet all the deadlines, but has not had time to complete the answer  
6 or response. The undersigned is doing the best he can under the circumstances.

7 3. This Motion is not submitted solely for the purpose of delay or for any other  
8 improper purpose.

9 This Court should grant an extension of time to, and including, August 12, 2020, for  
10 the United States to file its answer or other responsive pleading.

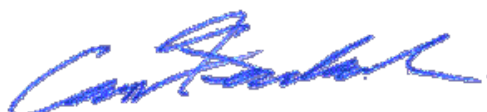
11 Dated this 15th day of July 2020.

12 Respectfully submitted,

13 NICHOLAS A. TRUTANICH  
14 United States Attorney

15 /s/ Daniel D. Hollingsworth  
16 DANIEL D. HOLLINGSWORTH  
17 Assistant United States Attorney  
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21 IT IS SO ORDERED:

22  
23   
24 Cam Ferenbach  
25 United States Magistrate Judge  
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27 DATED: 7-22-2020  
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